

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 15 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE K. PATTERSON,

Defendant.

4:18CR692 AGF/SPM

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer J. Roy, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. A Federal Grand Jury sitting in the Eastern District of Missouri returned a two-count indictment charging the defendant in Count One with Robbery in or affecting interstate commerce, in violation of Title 18, United States Code, Section 1951, and Count Two with possession and use of a firearm in connection with a crime of violence, in violation of Title 18, United States Code, Section 924(c).

2. According to St. Louis Metropolitan Police Department ("SLMPD") Complaint Number 18-032600, on July 16, 2018, police officers responded to a radio assignment for a Robbery at the Family Dollar store located on the 5900 block of Delmar in the City of St. Louis, Missouri. Employees advised that an individual later identified to be the defendant pointed a handgun at them and ordered them to open the safe. The employees gave the defendant the

money in the safe but the defendant dropped the bag prior running out of the store. Officers arrested the defendant in the area and later recovered the defendant's firearm. The defendant was advised of his constitutional rights pursuant to *Miranda v. Arizona* and consented to an interview. The defendant stated that he heard the Dollar Store was "an easy hit" and that the gun was purchased legally.

3. A rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

4. The nature and circumstances of the offense charged, which involves armed robbery, reflects a danger to the community that would be posed by the defendant's release.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

BY: /s/ Jennifer J. Roy
JENNIFER J. ROY, #47203MO
Assistant United States Attorney